

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PROMEDEV, LLC dba RELIEF FACTOR,

Plaintiff,

v.

AGE RELIEF, LLC; and MICHAEL JOSEPH  
REDMOND,

Defendants.

CASE NO. 2:22-cv-01824-RSM

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT**

**NOTE ON MOTION CALENDAR:  
Tuesday, January 17, 2023**

Plaintiff Promedev, LLC dba Relief Factor ("Plaintiff") and defendants Age Relief, LLC and Michael Joseph Redmond ("Defendants") (collectively, the "Parties"), by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed its Complaint on December 28, 2022;

WHEREAS, Defendants were served with the Complaint on December 30, 2022, making their current response deadline January 20, 2023;

WHEREAS, Defendants' counsel were recently retained and are currently evaluating the underlying facts, Plaintiff's allegations, as well as potential defenses;

WHEREAS, Defendants have not previously sought any extension of time;

WHEREAS, the Parties agree to extend the deadline by which Defendants may respond to the Complaint to February 17, 2023;

WHEREFORE, IT IS HEREBY STIPULATED AND AGREED TO BY THE PARTIES, that Defendants may have until February 17, 2023 to file and serve a response to the Complaint.

1 RESPECTFULLY SUBMITTED on this 17<sup>th</sup> day of January, 2023.

2 **GOLDFARB & HUCK ROTH RIOJAS, PLLC**

3 /s/Kit W. Roth

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5 /s/R. Omar Riojas

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21 Attorneys for Plaintiff

**ORDER**

Pursuant to the above stipulation, **IT IS SO ORDERED.**

DATED this 18<sup>th</sup> day of January, 2023



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

Presented by:

/s/Kit W. Roth

Kit W. Roth, WSBA No. 33059

/s/R. Omar Riojas

R. Omar Riojas, WSBA No. 35400

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Attorney for Defendants

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically with the Clerk of the Court using the CM/ECF system on January 17, 2023 and was served via the Court's CM/ECF system on all counsel of record.

/s/ Kit W. Roth  
Kit W. Roth, WSBA No. 33059